



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: 9700057

Category: NSPS
EPA Office: Region 4
Date: 03/17/1995
Title: Boiler Derate-Speedling
Recipient: Gonzalez, Carlos
Author: Harper, Jewell

Subparts: Part 60, Dc, Small Indust.-Comm.-Inst. Steam Gen. Units

Abstract:

Q. Will replacing a 300 boiler horsepower (BHP) oil metering stem with a 200 BHP metering stem be sufficient to derate the boiler and avoid Subpart Dc applicability?

A. Yes. The proposed derate involves a permanent physical change that prevents a facility from operating in excess of the threshold for Subpart Dc applicability. The fact that a boiler outage would be required to reverse the change indicates that the change is permanent.

Letter:

4APT-AEB Mar 17, 1995

Mr. Carlos Gonzalez
Environmental Protection Commission of Hillsborough County 1900 - 9th Avenue Tampa,
Florida 33605

SUBJ: Proposed Boiler Derate for Speedling, Inc.

Dear Mr. Gonzalez:

This letter is in response to your March 7, 1995, for a determination regarding an approach that Speedling, Inc. has proposed for derating a boiler in order to exempt it from 40 C.F.R. Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. After reviewing this proposal, Region 4 has determined that it constitutes an acceptable means of derating the boiler to avoid applicability under Subpart Dc.

Speedling has proposed to derate the boiler by replacing its 300 boiler horsepower (BHP) oil metering stem with a 200 BHP metering stem. This replacement will limit the boiler heat input capacity to approximately 9.6 million BTU per hour by restricting the amount of oil that can be burned to 69 gallons per hour. The applicability threshold for Subpart Dc is 10 million BTU per hour. In order to reverse the proposed change, the boiler would have to be shut down, and burner adjustments would have to be made by a boiler technician after reinstallation of the 300 BHP metering stem.

In a previous determination about derating facilities to avoid New Source Performance Standards (summary enclosed), the U.S. Environmental Protection Agency (EPA) indicated that a derate must involve a permanent physical change that prevents a facility from operating in excess of the applicability threshold in an NSPS. According to this previous determination, one of the criteria used to determine if a change is permanent is whether it is necessary to shut the facility down in order to reverse the change. Since the replacement of the oil metering stem at Speedling will limit the boiler heat input capacity to less than 10 million BTU per hour and will require a boiler outage to reverse, it constitutes an acceptable derate under the criteria that EPA has previously used for evaluating such proposals.

If you have any questions about the determination in this letter, please contact Mr. David McNeal of my staff at 404/3473555, voice mail box 4158.

Sincerely yours,

Jewell A. Harper
Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division

Enclosure